Department of the Interior
Environmental Impact Statement

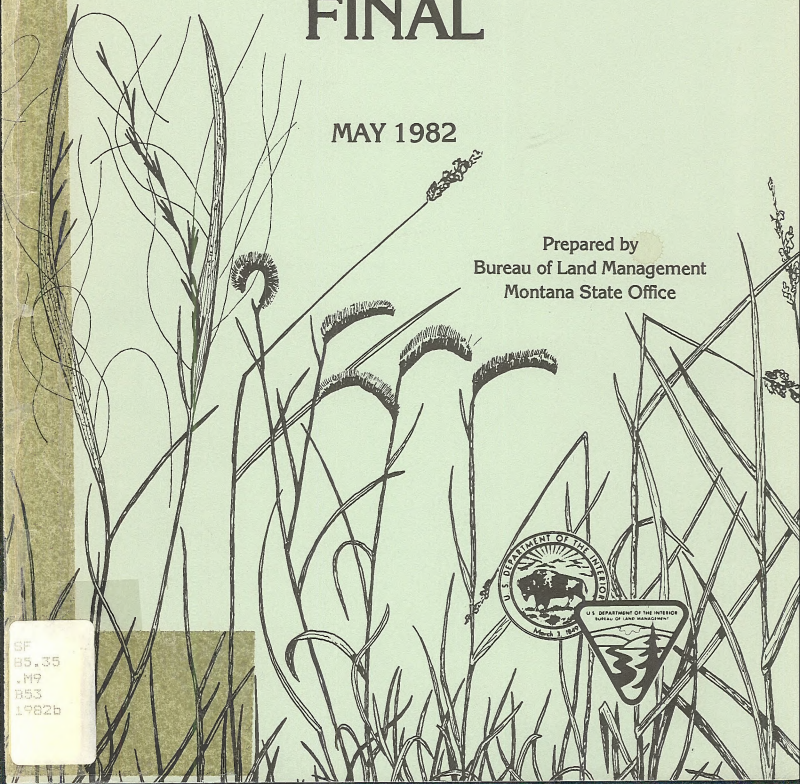
BIG DRY

VEGETATION ALLOCATION

FINAL

MAY 1982

Prepared by
Bureau of Land Management
Montana State Office



SF
85.35
.M9
B53
1982b

As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interests of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.

88023660

IN REPLY REFER TO

SF
85.35
.M9
B53
1982b

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
222 North 32nd Street
P.O. Box 30157
Billings, Montana 59107

BLM Library
D-555A, Building 50
Denver Federal Center
P. O. Box 25047
Denver, CO 80225-0047

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225

May 10, 1982

Dear Reader:

The Big Dry Final Environmental Impact Statement is to be used in conjunction with the draft environmental impact statement issued February 9, 1982. That document describes a proposed grazing management program for approximately 1.18 million acres of public lands administered by the Bureau of Land Management in its Big Dry Resource Area and analyzes three alternatives to the proposed action.

Corrections and revisions made to the draft are shown in this final statement. Comments on the draft that were made at public hearings and by letter are also included, along with the BLM's responses to those comments. Because the changes suggested through the public review process did not require a major rewrite of the draft, the draft statement and its accompanying map supplement are incorporated into this final environmental impact statement by reference, resulting in substantial cost saving. A limited number of copies of the draft and the map supplement are available at the Bureau of Land Management, Miles City District Office, P.O. Box 940, Miles City, Montana 59301.

This final environmental impact statement is not the decision document. The decision on the action to be taken will be based on the analysis contained in this statement, the BLM's personnel and budget constraints, public concerns and comments and other multiple use resource objectives or programs applicable to the area. No action can be taken until at least 30 days have passed after the final statement is filed with the Environmental Protection Agency and distributed to the public. A Rangeland Program Summary will be prepared as soon as a decision is reached. This document will outline the management direction for the Big Dry EIS area. More specific decisions will subsequently be developed on an allotment-by-allotment basis.

We would like to thank the individuals and organizations whose comments and suggestions have helped us to prepare a document that will lead to more effective management of public lands. Their interest is appreciated.

Sincerely yours,

Michael J. Penfold

Michael J. Penfold
State Director

DEPARTMENT OF THE INTERIOR
ENVIRONMENTAL IMPACT STATEMENT

VEGETATION ALLOCATION IN THE BIG DRY AREA OF MONTANA

FINAL

to be used with the Draft

Prepared By

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

Michael J. Penfold

STATE DIRECTOR
MONTANA STATE OFFICE

May 1982

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

BIG DRY VEGETATION ALLOCATION

FINAL ENVIRONMENTAL IMPACT STATEMENT

PORTIONS OF GARFIELD, ROSEBUD, McCONE, CUSTER, AND CARTER COUNTIES AND ALL OF DAWSON, FALLON, PRAIRIE, RICHLAND, AND WIBAUX COUNTIES IN MONTANA

Incorporated into the Final Environmental Impact Statement by reference, the Draft Environmental Impact Statement (EIS) discussed proposed vegetation allocations for nearly 1.18 million acres of public lands administered by the Bureau of Land Management in the Miles City District. Four alternative courses of action, including a Preferred Alternative, were studied in the EIS along with the environmental consequences of each alternative. From the four alternatives, final vegetation allocations and management action will be decided.

Summaries of the alternatives in the EIS are as follows: (corrections occur in bold type).

Alternative A, "Continued Development for Optimum Range Utilization," would have the management goal of keeping livestock and other uses in line with the estimated grazing capacity through continuation of rangeland improvements, grazing systems and monitoring programs. Thirty existing AMPs would be revised and 63 new AMPs would be implemented to bring 49% of the less than good land into good or better range condition. The remaining 51% (48,730 acres) of less than good lands are scattered among the remaining 684 permittees. This alternative would continue the present management system with increases resulting from improvement of the areas presently in less than good condition.

Allocations to both livestock and wildlife and other uses would increase in the long term due to improved ecological range condition. This is the BLM's preferred alternative.

Alternative B, "Enhanced Watershed Value and Wildlife Habitat," would reallocate 19% of the vegetation from livestock to nonconsumptive and wildlife uses, and would continue the 30 existing Allotment Management Plans (AMPs) and implement 63 new AMPs. Range condition would be maintained or improved. Vegetation condition would improve on riparian areas around reservoirs, on floodplains and on erosion-susceptible areas. Wildlife habitat would improve. Rancher income would decrease, but total area earnings would increase in the short term.

Alternative C, "No Grazing," would eliminate livestock grazing on public land. No range improvements would be built or maintained unless deemed necessary for protection of watershed or wildlife resources. Ecological range condition of most rangelands would improve in the short term. Wildlife habitat would improve initially but would be negatively affected in the long term.

Rancher income would decline. Construction of 7,400 miles of fence would be necessary to implement this alternative.

Alternative D, "No Action," would freeze the current range program of 30 AMPs with continuation of current range allocations and no new range improvements being constructed. Ecological range and watershed condition would decline in the long term. Wildlife habitat would remain static or be reduced in quality. Fishery reservoirs would be adversely affected by accelerated sedimentation. Long term ranch income and employment would likely decline from decreased forage production.

The final EIS must be used in conjunction with the draft EIS as it corrects the draft and incorporates public comments. For further information, contact Ray Brubaker, District Manager, Miles City District Office, Bureau of Land Management, P.O. Box 940, Miles City, Montana 59301 or phone (406) 232-4331.

MAY 1982

COMMENTS REQUESTED

Comments on the draft EIS were requested from the following agencies, organization and interested groups:

Federal Agencies

Advisory Council on Historic Preservation
Soil Conservation Service
Department of Defense
  U.S. Army Corps of Engineers
Department of Commerce
Department of the Interior
  Bureau of Indian Affairs
  Bureau of Mines
  Fish and Wildlife Service
  Geological Survey
  Bureau of Reclamation
Environmental Protection Agency

Congressional Offices

Office of Congressman Ron Marlenee
Office of Congressman Pat Williams
Office of Senator Max Baucus
Office of Senator John Melcher

State Agencies

Montana Association of State Grazing Districts
Montana Bureau of Mines & Geology
Montana Department of Community Affairs
Montana Cooperative Extension Service
Montana Department of Fish, Wildlife, and Parks
Montana Department of Health and Environmental Sciences, Water Quality Bureau
Montana Department of Natural Resources and Conservation
Montana Department of State Lands
Montana Governor's Office
Montana State Historic Preservation Office
Eastern Montana College
Montana State University
Old West Regional Commission
University of Montana

County Commissioners and Planning Boards

Carter County
Custer County
Dawson County
Fallon County
Garfield County
McCone County
Prairie County
Richland County
Rosebud County
Wibaux County

Other Organizations

Audubon Society
Circle Rifle Club
Custer Rod & Gun Club
Defenders of Wildlife
Farm Bureau
Friends of the Earth
Izaak Walton League
Lower Yellowstone Outdoors Association
McCone Agriculture Protective Organization
Montana Chamber of Commerce
Montana Farmers Union
Montana Pork Producers Assn.
Montana Public Lands Council
Montana Snowmobile Association
Montana Stockgrowers Association
Montana Woolgrowers Association
National Council of Public Land Users
Natural Resources Defense Council
Northern Plains Resource Council
Sierra Club
Society for Range Management
Wibaux Area Council
Wilderness Society
Wildlife Management Institute
Wildlife Society, Montana Chapter

Individuals

James Morgan (Plaintiff in Natural Resources Defense Council, Inc., et al vs. Rogers C. B. Morton, et al)

Further comments were received from public hearings in March 1982. Copies of the draft EIS were available for public review at BLM Offices in Billings and Miles City and at public libraries in communities in the Big Dry area.

SUMMARY

(The following is the Summary Section that appeared in the draft EIS. No major additions or corrections were necessary.)

The Big Dry Environmental Impact Statement (EIS) includes the Bureau of Land Management's (BLM) northern division of the Miles City District, the Big Dry Resource Area. The total area of the Big Dry is around 10.8 million acres, encompassing all or parts of 10 eastern Montana counties. This area contains about 1.18 million acres of public lands administered by the BLM.

Soil and vegetation inventories, water resource surveys, social and economic surveys and other resource inventories were begun in 1977 and completed in 1981. Throughout the resource inventory and survey process, the public was asked to suggest issues and concerns on the use of public lands.

Public participation in BLM's planning process was solicited through individual interviews in the EIS area, newspaper articles and the mailing of more than 2,600 brochures to livestock operators using public lands, residents and interested groups in the area. About 40 comments were received as a result of this brochure. In addition, open house sessions were held in Terry and Baker, Montana March 23-24, 1981, to solicit responses from the public. A list of agencies and organizations consulted or commenting on public land issues can be found in Chapter 5.

Based on resource inventories, issues raised by the public and procedural requirements, four alternative courses of action were developed. Alternative A, "Continued Development for Optimum Range Utilization," was selected as the preferred alternative because of the resource benefits, cost and public comment. After reviewing the draft EIS, decision-makers will select the final rangeland management program to be implemented on public lands in the Big Dry EIS area. This management program may be the preferred alternative or it may incorporate parts of all alternatives.

Major concerns raised by the public were:

> Livestock production, wildlife numbers and water development. Local residents expressed concerns relating to the control of undesirable plant species, control of prairie dogs and making more water available for livestock.
>
> Wildlife concerns of the public included balancing wildlife and livestock use and maintaining and improving wildlife habitat. Other public concerns centered on the protection of watershed and soil resources. Many people felt that things should be left as they are because long time resource conservation practices in effect over the years have maintained or improved resource conditions overall on both private and public lands. BLM resource specialists raised issues almost parallel to those of the public. Major concerns brought forth both by the public and by BLM specialists are considered in this DEIS.

The major livestock issue is the need to maintain or improve ecological range condition. Of the 1,178,777 acres of public lands in the EIS area, 2,223 acres are in poor ecological range condition, 93,268 acres are in fair condition, 1,004,061 acres are in good to excellent ecological range condition; and 19,254 acres are unclassified as to condition. An additional 59,971 acres are classed as tame pasture.

In this EIS, the four alternatives from which the final grazing management program will be selected are titled: (a) Continued Development for Optimum Range Utilization, (b) Enhanced Watershed Value and Wildlife Habitat, (c) No Grazing and (d) No Action.

These alternatives were developed from information and recommendations in the Redwater, New Prairie, and Jordan-North Rosebud Management Framework Plans, (MFPs). Recommendations from the Step II MFP provided the basis for Alternative A. Recommendations from Step I wildlife and watershed were used to develop the basis for Alternative B. Alternative D assumes a "freeze" on developments and use of existing information and projections without further development. Alternative C assumes total removal of livestock and projects range conditions without domestic grazing.

Proposals in Alternatives A and B would reduce the amount of range in poor and fair ecological range condition. Alternatives A and B increase the forage allocation to livestock in the long term.

Initial livestock animal unit months (AUMs) would remain the same in Alternatives A and D, decrease by 19 percent in Alternative B and decrease to zero in Alternative C. In the long term (15 years after implementation), Alternative C would result in no livestock AUMs; Alternative D would not change livstock AUMs and Alternatives A and B would increase the livestock AUMs above the short term projections. The preferred alternative would increase livestock forage by six percent, because of the implementation of mechanical and grazing treatments and the development of range facilities.

Both the public and BLM are concerned with maintaining adequate wildlife habitat while maintaining a balance between livestock and wildlife use.

Protecting soil by reducing erosion is another major concern of both the public and BLM resource specialists. Increasing vegetation cover through mechanical or grazing treatments would improve the capacity of the soil to absorb the water necessary for vegetation production. Increased absorption of moisture into the soil reduces runoff, erosion and maintains soil productivity. High levels of vegetation production would increase the

amount of forage for both livestock and wildlife use. Other watershed concerns include limiting early season livestock use on wet soils in riparian zones to reduce soil compaction.

A summary of the environmental consequences for each of the four alternatives follows.

Alternative A: Continued Development for Optimum Range Utilization

As the preferred alternative, this proposes revision while continuing operation of the 30 existing AMPs on 227,776 acres of public lands, implementation of 63 new AMPs on 294,798 acres and continued permitted grazing on 684 allotments, 651,781 acres, not proposed for AMP implementation.

Watershed condition would improve in the long term, with a reduction of sediment and water yields by approximately 20% and 18%, respectively.

Ecological range condition would be maintained or improved to good to excellent condition on most lands with a vegetation production increase of 54.5 million pounds. The vegetation allocations to livestock and wildlife would increase by six percent in the long term.

Wildlife habitat would improve with special consideration given to protect crucial wildlife habitat and wintering areas. Prairie dog control would be evaluated on a case-by-case basis in accordance with the statewide prairie dog management policy.

Improved watershed and ecological range condition would reduce the natural destruction of some cultural resource sites by erosion. Long term loss of scientific data could occur if sites were destroyed by ground disturbances resulting from implementation of range projects and land treatments. However, most range improvements would be located to avoid cultural sites.

Implementaton of this alternative would result in an increase of $205,638 in annual total income on 350 ranch operations. Total permit values would increase by $1,703,000, or 7% of the present total, in the long term. Social impacts to the ranching community would be positive in the short and long term.

Regional earnings would increase by $1,635,000 annually and employment would increase by 134 persons in the short term. There are no long term changes in either category.

Total implementation cost of this alternative would be $11,955,751.

Alternative B: Enhanced Watershed Value and Wildlife Habitat

This alternative proposes continuing the 30 existing AMPs, implementation of 63 new AMPs and continue permitted grazing on 684 allotments unsuitable for AMP implementation.

Watershed condition would improve in the long term, with a reduction of sediment and water yields by approximately 28% and 23% respectively.

Range condition would be maintained or improved to good or excellent condition on most lands. Vegetation condition would improve in riparian areas, around reservoirs, on floodplains and erosion-susceptible areas. Livestock allocations would be reduced by 48,674 AUMs in the short term due to the reallocation of AUMs to nonconsumptive uses and wildlife. In the long term there would be a 7% increase of AUMs to livestock and a 6% increase to nonconsumptive uses and wildlife beyond the short term projections.

Wildlife habitat would improve for big game, upland game and waterfowl as would nongame habitat and 33 additional fisheries reservoirs are proposed.

Improved watershed and ecological range condition would reduce the natural destruction of some cultural resource sites by erosion. Long term loss of scientific data could occur if sites were destroyed by ground disturbances resulting from implementation of range projects and land treatments. However, most range improvements would be located to avoid cultural sites.

This alternative would result in a short term annual decrease of $544,306 on 418 ranch operations. Long term annual decreases would be $481,435 on 335 operations and long term annual increases would be $90,938 on 176 operations. Total permit values would decrease by $4,866,000 in the short term and $3,264,000 in the long term.

Ranchers' attitudes toward BLM would be negative due to decreased forage allocation to livestock. Recreationist and environmentalist attitudes would be positive due to increased wildlife habitat and reduced livestock conflicts.

Total earnings would increase by $1,358,000 annually in the short term due mostly to increased construction, and decrease by $231,000 annually in the long term. Total employment would increase by 106 people in the short term and decrease by 23 persons in the long term.

Total implementation cost of this alternative would be $15,476,551.

Alternative C: No Grazing

This alternative would eliminate livestock grazing on public lands affecting 777 allotments. No range improvements would be built or maintained unless the improvements were considered necessary for watershed or wildlife resources.

Watershed conditions would improve with a reduction of sediment and water yield by 54% and 30%, respectively.

Ecological range condition of most rangelands would improve while areas occupied by prairie dogs would decline or become poor. Noxious weeds would be controlled when threatening to private lands.

Wildlife habitat would improve initially, but would trend toward a climax vegetation which is a less desirable habitat. Prairie dog control would be necessary to protect private lands and crucial wildlife habitat affected by expansions of existing towns.

In short and long term, income would decrease on 608 operations (see Appendix 3.9). The decrease in net income would be 24% of the current total.

Rancher attitudes would be extremely negative toward this alternative.

Total earnings would decrease $501,000 annually in the short term and $3,009,000 annually in the long term. Total employment would have a net decrease of 60 people in the short term and 303 people in the long term.

Total implementation of this alternative would be $16,944,100 (the cost to the private landowners to fence off public land with approximately 7,400 miles of fence).

Alternative D: No Action

This alternative would freeze the current range program of 30 AMPS. Vegetation allocations would remain the same, regardless of range condition. AMPs in effect would continue, but no new range improvements would be developed. Maintenance of current improvements would be allowed.

Watershed condition would decline with an increase in sediment and water yields of 15% and 12%, respectively.

Ecological range condition would decline in the long term. Production would also decline in the long term due to the spread of prairie dogs, noxious weeds and lack of responsive grazing management.

Wildlife habitat would remain static or be reduced in quality with the lack of rest or deferment grazing treatments. Prairie dog towns would be allowed to expand. Some existing fisheries reservoirs would be lost as viable fisheries because of accelerated sedimentation.

No changes in ranch income and employment can be quantified in this alternative. However, reductions in both are likely in the long term as livestock forage production decreases.

Rancher attitudes toward this alternative would be negative because of a deteriorating range condition and less opportunity for income gain.

There would be no implementation cost for this alternative as maintenance to fences would be the responsibility of the operator and by 1984, maintenance cost of reservoirs, springs, etc., would also be their responsibility.[1]

[1]BLM Range Improvement Policy, 1981

CONTENTS

COMMENTS REQUESTED i

SUMMARY ii

PUBLIC INVOLVEMENT 1
- Consultation and Coordination 1
- Public Involvememt and Consultation During Development of the Draft EIS 1
- Public Comments on the Draft EIS 1
  - Speakers, Letter Writers and Phone Comment 2
  - Comments from Public Meetings 2
  - Letters 3
- Responses to Comments and Letters 9

CORRECTIONS/ERRATA 15

PUBLIC INVOLVEMENT

CONSULTATION AND COORDINATION

The Big Dry Vegetative Allocation Environmental Impact Statement was prepared by specialists from the BLM's Miles City District Office with assistance from BLM's Montana State Office. Disciplines and skills used to develop this EIS were: vegetation and rangeland use, animal husbandry, recreation, climate, sociology, economics, geology, hydrology, soils, cultural resources, wildlife, fisheries, graphics, editing, printing, public affairs and typing. Writing of the EIS began in June 1981 following a complex planning and data gathering process. The process included inventories of resources, public participation, coordination with other agencies and a planning effort. Consultation and coordination with agencies, organizations and individuals occurred throughout this process.

PUBLIC INVOLVEMENT AND CONSULTATION DURING DEVELOPMENT OF THE DRAFT EIS

An intense public participation process was conducted during the development of this EIS. An analysis document, a sampling of public opinion by interviews of people in the Big Dry Resource Area communities, a program to draw issues from the public and a notice in the *Federal Register* were all used to elicit public views on the EIS. This process also drew useful comments from other agencies.

The major portion of the public participation process was identifying issues which the public wanted considered in this EIS. This procedure consisted of the mass mailing of an information brochure, letter and return mailer asking for issues people felt should be considered in the Big Dry EIS. A summary of these reponses was provided in another brochure mailed to the original recipients.

Included with the first brochure was a schedule for public meetings held in Terry and Baker, Montana. The meetings were used to explain the EIS process, gather additional views and inform people of how the issues would be used. From this procedure, an alternative was designated the "preferred" alternative, namely, the Continued Development for Optimum Range Utilization.

As can be seen, the public's role was vital in the development of this EIS.

The Montana State Historical Preservation Officer (SHPO) was consulted and commented on this EIS. SHPO along with the Advisory Council on Historic Preservation, had an opportunity to review the draft EIS.

Informal consultation with the U.S. Fish and Wildlife Service regarding threatened and endangered species also took place during the preparation of this EIS. Region 7 personnel of the Montana Department of Fish, Wildlife and Parks informally reviewed draft sections on wildlife and indicated that their comments were properly depicted in the EIS.

PUBLIC COMMENTS ON THE DRAFT EIS

After the draft EIS was released to the public and filed with the Environmental Protection Agency on February 9, 1982, a period of 55 days was allowed for public review and comment. The *Federal Register* of February 19, 1982, notified the public that the EIS had been published and announced public hearings in Forsyth, Terry and Baker, Montana, March 1-3, 1982.

A news release was issued on February 11, 1982, to daily and weekly newspapers, and radio and television stations throughout Eastern Montana announcing that the draft EIS was available. The news release, which received wide coverage, summarized the draft EIS and gave dates, times and locations for public hearings.

Copies of the draft EIS were sent to the organizations and individuals and to all public lands livestock operators in the Big Dry EIS area. Approximately 500 reading copies of the draft EIS were distributed. Public reading copies were available at BLM offices in Washington, D.C., Billings and Miles City, Montana, at Montana universities and colleges and at public libraries in the area covered by the EIS.

A professional court reporter prepared a verbatim transcript of each public hearing. Comments from the transcripts have been summarized in this document. The comments numbered consecutively are those received in letters; the letters received are reprinted in the pages following the comments from the hearing. Our responses to all oral and written comments appear following the reprinted letters.

Copies of the final EIS were forwarded to the Secretary of the Interior and to the Environmental Protection Agency.

Canada Thistle

Speakers, Letter Writers & Phone Comment

Speaker Number	Name	Meeting & Location Date
1	Steve Tibbets	Terry, March 2
2	Kenneth Nimitz	Terry, March 2
3	George Gunderson	Baker, March 3

Letter Number	Name	From
1	Dennis R. Loreth	Soil Conservation Service
2	Eldon Rice	Rosebud Co. Planning Board
3	Ted Ostendorf	Ismay, MT
4	Walter Buxbaum	Richland Co. Conservation Dist.
5	Richard D. Gorton	Corp. of Engineers
6	J. Ratzloff	Lakewood, Colo.
7	Vincent Crago	Crago Cattle Company
8	Daniel A. Poole	Wildlife Management Institute
9	Albert Stickel	Fallon, MT
10	Alan O'Neill	National Park Service
11	Neil S. Martin	Reg. 7-Dept. of Fish, Wildlife & Parks
12	Ruth V. Roos	Prairie Co. Coop. Grazing Dist.
13	Robert F. Neumann	Red Butte Coop. Grazing Dist.

Comment by Phone	Name	From
1	Mrs. Jean A. Whaley	Waco, Texas

Comments From Public Meetings

Speaker 1: It looks like someone has gone to a lot of work to put this together and talk about controlling noxious weeds and these predator animals (prairie dogs) on this grazing land. The people that use this BLM land are real interested in controlling these predators and noxious weeds. Talking to my neighbors across the county, some of these noxious weeds and predator animals have us quite concerned. Some people think we should get rid of them (prairie dogs) altogether, but I think we should keep them under a little bit of control too.

Speaker 2: What I would like to say is that the amount of money and time and manpower it has taken to do this EIS and some of the things they got into it has been known all along, if we could have had that much money spent out on this land in the past few years we would have been in way better shape than we are right now.

Speaker 3: I am with the Taxpayers Association, and we have gone on record that we are in favor of selling as much land as can be for, you know, tax base in this area.

1

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE P. O. BOX 1200 FORSYTH, MONTANA 59327

March 2, 1982

DD		
DA (AC)		
DC		
DE		
DM		
DS		
DW		
DY		
DZ		

MAR 5 1982

Assistant Director		
Cartographic		
Classification		
Data Systems		
Engineering		
Range	DC	
Recreation		
Soil Correlator		
Soil Survey Interp.		
Water Rights		
Wildlife		

Ray Brubaker, District Manager
District Office
Bureau of Land Management
P. O. Box 940
Miles City, Montana 59301

Dear Mr. Brubaker:

I was unable to attend your public meeting here in Forsyth on the Big Dry EIS, but I have one specific concern.

Roy Houser, my predecessor, contacted your office in the fall of 1978 about a very small patch of halogeton along a short stretch of the main road in Section 33, T11N, R34E.

1 Since that time the small patch had grown considerably as observed in the fall of 1980. Is there plans to control this noxious weed before it spreads beyond the point of reasonable control?

If there is any way our office can be of help to you, please contact me.

Sincerely,

Dennis R. Leresh
District Conservationist

DRL/jl

cc: Dennis E. Kenney, Chairman, Rosebud Conservation District
Bill Gerhart, Permit Holder
File

3

Dear Sir:

I feel that alternative A would be acceptable on most situations. One of the most serious problems at present is the spread of hoary cress. This should be the top priority for B.L.M. in the Powder River as completely infested, and it will take a massive effort to control it.

Sincerely,
Ted Whitney
Dewey, Mont.

MAR 1982
Bureau of Land Management
Miles City, Montana

2

March 9, 1982

Mr. Ray Brubaker
P.O. Box 940
Miles City, MT 59301

Dear Sir,

2 My primary concern regarding the Range Lands of the Northern Great Plains is with wind and water erosion. I would like to know what the policy of BLM might be in breaking out large tracts of Rangeland for Farming. Particularly the lands in Classes VI, VII, or VIII.

I have reviewed the Draft E.I.S. and favor alternative A, continued development for optimum range utilization.

Thank you for this opportunity to comment.

Sincerely,

Eldon Rice

ER/er

4

Richland County Conservation District

12 March 1982

Mike Penfold, State Director, BLM
222 North 32nd Street
Box 30157
Billings, MT 59107
RE: Big Dry EIS Review

I am responding to your February 11, 1982 letter on the Richland County portion of the E.I.S.

There has been a need for change for improvement of federal lands. It would appear that a compromise between Alternative A & Alternative B would be best, considering the net results for reduction of sediment, Wildlife Habitat improvement and maintenance of livestock grazing while improving the range resource.

4 I was surprised, that in Chapter 3, page 43 & 44, that the BLM did not request comments from the respective county Conservation District boards. Especially after some of the information provided for the EIS was gleaned from Conservation District Long Range Plan data.

Also in Appendix 1.1, page A-1 the Conservation Districts would have been very valuable in the reviewing process relative to the intersection of federal lands with private lands.

5 Our district conservationist called to our attention that the following additions to Appendix 3.3 would more correctly include all of Richland County soils.

Appendix 3.3
Item 3 - Saline Lowland - include Typic Haplaquents
Item 5 - Sands - include Banks.
Item 7 - Silty - include Havredon.
Item 11 - Thin Silty - include Lismert, Vida.
Item 12 - Thin Clayey - include Stanyan.

The proposed AUP for allotment numbers 3004, 3005, 3014 should be easy to obtain since these units are under contract w/CPCP and numerous miles of livestock pipelines have been completed. Also for #2937.

Sincerely,

Walter Buchanan, Chairman, RCCD

DEPARTMENT OF THE ARMY
OMAHA DISTRICT CORPS OF ENGINEERS
601 U S POST OFFICE AND COURTHOUSE
OMAHA NEBRASKA 68102

REPLY TO ATTENTION OF

5

NRDPD-M

27 March 1982

Mr. Michael J. Penfold
State Director
Bureau of Land Management
222 North 32nd Street
Post Office Box 30157
Billings, Montana 59107

Dear Mr. Penfold:

We have reviewed the Big Dry Draft Environmental Impact Statement (EIS) Vegetation Allocation.

Alternatives A, B, and C should result in a reduction of flood hazard over the long term. Alternative D will apparently result in an increase in flood hazard over the long term.

Your EIS is well written and adequately addresses our concerns. Thank you for the opportunity to review your document.

Sincerely,

RICHARD D. GORTON, Chief
Environmental Analysis Branch
Planning Division

6b

(p. 9) gives us another version. It shows that 95,491 acres of fair and poor range would improve, decreasing the long-term total of fair or poor lands to near zero. Good and excellent condition rangeland would increase by 114,745 acres. Finally, in the watershed section of chapter 4, we find that 159,000 acres of fair or poor condition rangeland exist, and that 128,000 acres of these lands are suitable for range treatment. After seeing the array of predictions and figures in the EIS, one questions the credibility of the document, and wonders how the figures were derived. If the EIS team cannot keep the impact figures straight, how is the public supposed to read the EIS with any understanding?

2.-Several sections of the EIS state that improvement is expected from the proposed range treatments and from grazing management (revision of 30 existing AMPs and creation of 60 new AMPs). Proper management is defined in the vegetation section of chapter 4 as "(stocking, rest, deferment)"(p. 31). However, stocking levels would not be reduced, but increased in the long term as more forage becomes available. (An increase of 17,030 AUMs) Therefore, rest and deferment as incorporated into grazing systems are the primary causal agents of the vegetation improvement expected from proper grazing management. The watershed section states that "proper management would include rest, deferment, and alternating use (Hormay 1970)."(p. 29) Because of these discussions, and examination of the previously-implemented AMPs, which contain largely deferred or rest-rotational grazing, I am assuming that the vegetation improvement expected from grazing management is significantly as a result of rotational grazing systems. This is consistent with appendix 4.1, which shows an improvement from rotational grazing

7

6a

March 20, 1982

Mr. Ray Brubaker, District Manager
District Office, BLM
P.O. Box 940
Miles City, Montana 59301

Dear Mr. Brubaker:

Thank you for the opportunity to comment on the Big Dry Vegetation Allocation Draft EIS (Environmental Impact Statement). Following are comments on primarily the vegetation and watershed sections of the EIS.

1.-It is extremely difficult to track impacts from components of the alternatives, as the EIS is presently written. For example, I desired to analyze the long-term impacts from each of the two major components of the preferred alternative (A), the development of 60 new AMPs (Allotment Management Plans), and the treatment of 128,000 acres of rangeland. Nowhere in the EIS could I find documentation of their individual effects on vegetation condition, which makes it impossible to even roughly analyze their singular impacts. The projected vegetation response is always combined for these two parts of the proposed action, making the impacts of each unclear.

6

Another example of ambiguous impact prediction in the EIS is the handling of the areas in less than good condition in different sections of the EIS. On the first page of the EIS, it is stated that 49 percent (46,000 acres) of less than good condition land will improve to good or better, and the remaining 51 percent(47,830 acres) are in holdings unsuitable for management. I assume this to mean that this land will not be improved. Page 8, however, states that 155,462 acres of less than good condition land exist. Table 2.2

6c

systems.

The use of rotational grazing systems is standard practice in most BLM districts, and these grazing systems are presented as a means for improving range condition in almost every BLM EIS, as they are in the Big Dry EIS. It is my contention that this almost universal acceptance by BLM that rotational grazing systems will improve range condition is not valid. I would like to examine some of the range management literature in explaining the basis for my contention.

7

Support for rotational grazing systems often comes from Hormay and Talbot, 1961 [1]*, and Hormay, 1970 [2]. In his 1961 report, Hormay originally presented his theory of rest-rotation grazing from studies on the Harvey Valley cattle allotment on Lassen National Forest in Northeastern California. He stated the following:

> "Selective grazing, therefore, is one of the main causes of range deterioration, and the basic problem is to change the grazing pattern so that palatable forage species can be maintained on the most heavily grazed range area. . . Under rest-rotation grazing, stocking is based on the production and use of herbage from all the available forage species and not on the key species alone. Under this system, degree of use on plants does not have the same importance as under continuous seasonal grazing, because grazing is limited to a comparatively short time and is always followed by rest planned to be long enough to overcome the harmful effects of grazing. . . Further, under rest-rotation grazing little attention is paid to classifying plants according to palatability to determine forage production and stocking. . .Species rated low in palatability are often grazed as closely as species rated high. . . A fairly high stocking rate forces greater use of the less palatable forage species and the less accessible grazing areas. . ." (pp. 32-35)

Hormay concluded his report with the following statements:

> "A practical test of theasystem is now in progress on the Harvey Valley cattle allotment of the Lassen National Forest. Since results from this test are not available, the merits of rest-rotation grazing cannot be fully

*Numbers in brackets refer to entries in the bibliography.

6d

evaluated at this time."

As you can see, the 1961 Hormay report did not provide proof that rest-rotation grazing is more beneficial to vegetation than moderate, continuous grazing. We must look elsewhere for proof.

The grazing system studies at Harvey Valley allotment in Northeastern California were continued through the 1970's. In 1974, Ratliff and Reppert [3], reported on the study, and their results are extremely suprising. Based on data collected from 1965 to 1969, the following conclusions were stated:

"Continuous grazing, therefore, appears to be more effective in controlling competing vegetation than it is damaging to Idaho fescue."

". . . Idaho fescue can apparently maintain its vigor and reproduce under moderate, continuous grazing."

"It appears, however, that range managers cannot key seed production into a set program of rest-rotation grazing."

"Further, the full use treatments did not reduce nor did full-season rest improve Idaho fescue vigor on the Harvey Valley(rest-rotation) plots." (p. 449)

It is my opinion, based on the research I am citing, that predictions of vegetation improvement from rest-rotation and deferred-rotation grazing systems cannot be scientifically supported. This is clearly evidenced by Ratliff's and Reppert's conclusions, which are directly opposite of some of the premises Hormay put forth in his 1961 and 1970 discussions of the "theory" of rotational grazing.

I would like the author of the vegetation section of the EIS to comment on the following research in justifying his expected vegetation improvement due to implementation of grazing systems:

- Hyder and Sawyer, 1961 [4], in a 11-year study of the effects on vegetation of season-long vs. rotation-deferred grazing systems in a mixed sagebrush-bunchgrass plant community, found that the density of grasses had increased to a greater extent under season-long grazing by the end of the study period, than under the deferred-rotation grazing systems.

- A 5-year study, done by Currie, 1976 [5], found that systems of rotational grazing use did not influence herbage yields, basal areas, or plant densities of perennial bunchgrasses. Currie stated that "No reason or system of grazing was any more efficient than others, including complete protection, in promoting recovery. Thus instituting a complex rotation or management system is questionable management practice for promoting improvement or recovery of pine-bunchgrass ranges." (p. 448)

In discussing the use of specialized grazing systems, Stoddart, Smith, and Box, 1975 [6], stated that "There is little doubt that grazing systems result in better distribution of livestock and more uniform utilization of the range. Their beneficial effect on vegetation is less clear. . . From the data on hand it cannot be categorically stated that a rotational-grazing system will invariably improve the range or give greater livestock production than moderate, continuous seasonal grazing." (p. 297)

I will appreciate your serious response to the points I have raised in this comment, in light of section 1502.24 of the Regulations for Implementing NEPA (43 FR 55978-56007, November 28, 1978), which states that "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements."

6f

3.-I would like to find out what the sampling intensity was for each SVIM strata. How many SWA's (site write-up areas) in the same range site and condition class were sampled? Did this number (level of sampling) vary for different strata? Were all strata sampled? How many strata were present? Appendix 2.2 shows that 450 transects were completed. In an EIS area of 1,178,777 acres, this is an average of one transect for every 2,619 acres, or one transect every 4.09 square miles. This, combined with the fact that 10,000 acres were vegetation-mapped per day, causes me to contend that because the SVIM inventory covered such a large area with such a low sampling intensity, the results are worthless in inferring present vegetation characteristics. SVIM is designed to infer from a limited number of samples the characteristics of a stratum. However, as in any statistical inventory, as the sampling intensity is reduced, the quality of the results are reduced. What was your criteria used in setting the number of SWA's to be sampled per stratum? Did each SWA in the stratum have an equal chance of being sampled?

8

4.-I question the use of 11 million dollars of taxpayers money to implement alternative A. The ranchers, certainly, would not benefit to a great extent by this expenditure, which would result in an increase of 2 percent of the current livestock income for all ranchers. The ranchers are already subsidized by the Federal Government by receiving grazing use fees considerably lower than the private rate. This 11 million dollars cost to provide 350 ranchers with a total annual increase of 205,638 dollars is, frankly, a large-scale welfare program. I hardly see much gain received by watershed (decreased erosion) and wildlife (increased forage) when 85.2 percent of the EIS area is presently in good or excellent range condition, according

9

6e

systems in a mixed sagebrush-bunchgrass plant community, found that the density of grasses had increased to a greater extent under season-long grazing by the end of the study period, than under the deferred-rotation grazing systems.

- A 5-year study, done by Currie, 1976 [5], found that systems of rotational grazing use did not influence herbage yields, basal areas, or plant densities of perennial bunchgrasses. Currie stated that "No reason or system of grazing was any more efficient than others, including complete protection, in promoting recovery. Thus instituting a complex rotation or management system is questionable management practice for promoting improvement or recovery of pine-bunchgrass ranges." (p. 448)

In discussing the use of specialized grazing systems, Stoddart, Smith, and Box, 1975 [6], stated that "There is little doubt that grazing systems result in better distribution of livestock and more uniform utilization of the range. Their beneficial effect on vegetation is less clear. . . From the data on hand it cannot be categorically stated that a rotational-grazing system will invariably improve the range or give greater livestock production than moderate, continuous seasonal grazing." (p. 297)

I will appreciate your serious response to the points I have raised in this comment, in light of section 1502.24 of the Regulations for Implementing NEPA (43 FR 55978-56007, November 28, 1978), which states that "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements."

6g

to the SVIM inventory data. With the Federal deficit expected to break the 100 billion mark in fiscal year 1983, this kind of spending cannot be justified in light of the returns that are projected.

I am looking forward to your sincere consideration of my comments on the Big Dry Allocation Draft EIS.

Sincerely yours,

J. Ratzloff

Bibliography

[1] Hormay, A.L., and Talbot, M.W. 1961. Rest-rotation grazing--a new management system for perennial bunchgrass ranges. USDA Prod. Res. Rep. 51.

[2] Hormay, A.L. 1970. Principles of rest-rotation grazing and multiple-use land management. USDA, For. Serv. Training Text 4 (2200).

[3] Ratliff, R.D., and Reppert, J.N. 1974. Vigor of Idaho fescue grazed under rest-rotation and continuous grazing. J. Range Manage. 27(6): 447-449.

[4] Hyder, D.N., and Sawyer, W.A. 1951. Rotation-deferred grazing as compared to season-long grazing on sagebrush-bunchgrass ranges in Oregon. J. Range Manage. 4(1): 30-34.

[5] Currie, P.O. 1976. Recovery of ponderosa pine-bunchgrass ranges through grazing and herbicide or fertilizer treatments. J. Range Manage. 29(6): 444-448.

[6] Stoddart, L.A., Smith, A.D., and Box, T.W. 1975(3rd ed.). Range Management. McGraw-Hill Book Co., New York.

7

CRAGO CATTLE COMPANY

FEEDER CATTLE · LIVINGSTON BULLS · CHAMPION HORSES

R. R. 1, BOX 150
EDGEMONT, SD 57735

TELEPHONE 605-685-6886

BLM BIG DRY Resource Area Planning Office

Dear Sirs:

After reviewing the document as applied to the E.I.S. on the Big Dry Vegetation Allocation, it is my opinion that there is really only one feasible plan. Alternative A is the one. We can't lose sight of multiple use for federal lands. Livestock are about the only ones paying for the use of the lands. The ones paying should get first preference.

Equally important

Crago

8b

Mr. Ray Brubaker -2- March 22, 1982

14 prairie dog towns are a result of overgrazing, and should not be blamed for deteriorating range conditions. Only one reference is cited, both views should be included in the EIS.

Some specific comments follow:

15 page 2. How often in monitoring would "regular visits" occur? They could be years apart.

16 page 31. Middle column, 2nd par. We object to extending grazing seasons to reduce winter feeding. This would utilize exactly the cover and forage critical to wildlife. What percent of these shrubs is taken now by livestock?

17 page 31. Center column, 4th par, 3rd line. Remove the weasel words "If at all possible." Range improvements always should be placed outside riparian areas.

18 page 31. Wildlife, last par. "Minimize placing livestock water and salt in riparian and woody draws." Such placement should always be prohibited.

page 33. Middle column. Why call them "wildlife advocates?" You don't use such terms as "livestock advocates" or "mining advocates."

19 page A 44. How much of the implementation costs will be recovered by grazing fees or increased income taxes?

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:lbb

8a

Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774

DANIEL A. POOLE
President

C. R. JACKA
Secretary

V. L. WILLIAMSON
Treasurer

JACK S. PARKER
Board Chairman

March 22, 1982

BLM 1982 Resource Area Planning Office Billings, Montana

Mr. Ray Brubaker, District Manager
Bureau of Land Management
Post Office Box 940
Miles City, Montana 59301

Dear Mr. Brubaker:

The Wildlife Management Institute is pleased to comment on BIG DRY ENVIRONMENTAL IMPACT STATEMENT VEGETATION ALLOCATION, Montana.

Several changes are needed if the plan is to be acceptable for wildlife. More information must be provided and more detailed management plans specified.

The plan must discuss the federal responsibility, if any, to make up
10 or correct wildlife habitat deficiencies caused by the management practices on the intermingled private lands. A map must be included to identify which lands are cultivated crop lands on both private and public lands. Only then can the problems of habitat needs and diversity be evaluated.

11 A map of the existing and proposed range seedings also is needed.

It appears to us that the changes proposed are nearly all for livestock. This is borne out by page 5, Alternative A, 3rd par, this alternative proposed "optimum range utilization."

On page 31, Wildlife, 4th par, is a statement that rest rotation is
12 the most suitable method to preserve habitats on riparian areas and woody draws. This is the key wildlife portion of the plan. Yet only 3 of 30 existing AMP's are rest rotation, and the systems for the 63 new AMP's are not specified. Any wildlife benefits will be contingent on adoption of rest rotation. Otherwise, there is a good chance of deterioration of these critical habitats.

A special section on riparian management should be included. This
13 major conservation issue is not will addressed. No fencing is proposed and the grazing system is second choice.

There are only 2,900 acres of prairie dog towns (page 23). Their
14 wildlife importance is well described, yet plans to control them would be approved if range damage occurs, although prairie dog towns occupy a minute portion of the public lands on the planning unit. Some studies state that

9

BLM 1982 Resource Area Planning Office Billings, Montana

3/24/82
Billings

Response Form

NEW PRAIRIE MFP MANAGEMENT PLANNING

Page No.
5

Alternative A is the "best" because we only have one pasture left for cows.

Thank you for the opportunity to express my opinion

Date March 2 1982

YOUR NAME Albert Stoppel
AND ADDRESS Ekalaka Montana
Box 215 59324

10a

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:
L7619 (RMR-CS)
DES-82/5

Memorandum

To: District Manager, Bureau of Land Management, Miles City, Montana

From: Associate Regional Director, Cooperative Programs

Subject: Review of Draft Environmental Impact Statement for Big Dry Vegetation Allocation, Miles City District, Montana (DES-82/5)

20 This is in response to your request for our comments on the Big Dry Vegetation Allocation Draft Environmental Impact Statement.

No units of the National Park System are affected. However, the final environmental impact statement should recognize that the Lewis and Clark National Historic Trail passes through the study area along the Missouri and Yellowstone Rivers. The environmental consequences section should discuss what effect the various alternatives may have for users of the National Historic Trail. This evaluation should coincide with the comprehensive plan for management and use of the trail that is being prepared by the Regional Director, Midwest National Office, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102.

Also located within the study area are the following landmarks:

Bug Creek Fossil Area National Natural Landmark - McCone County

Capitol Rock National Natural Landmark - Carter County

Hagan Site National Historic Landmark - Dawson County

Hell Creek Fossil Area National Natural Landmark - Garfield County

These sites have been selected for their outstanding natural or historic qualities. Although no statutory protection has been given to areas designated under the National Natural Landmarks and National Historic Landmarks Programs, every effort should be made to avoid any adverse impacts. The final environmental statement should include an analysis of possible impacts to these areas under each of the alternatives.

Alan O'Neill

10b

21 Although BLM has completed an inventory of the study area, page 24 also states that future inventories can be predicted to identify more National Register quality sites. For this reason, we recommend contact with the State Historic Preservation Officer (SHPO) to obtain his opinion as to whether any such properties are located within the study area. In addition, you should obtain his opinion on the adequacy of present knowledge of cultural resources in the areas to be affected. The SHPO for Montana is Dr. Robert R. Archibald, Director, Montana Historical Society, 225 North Roberts Street, Veterans Memorial Building, Helena, Montana 59601.

22 Within the study area, the Little Missouri River in Carter County and the Musselshell River in Garfield County have been included in the final list of the Nationwide Rivers Inventory. Under guidelines from the Council on Environmental Quality, a action or licensing agency is responsible for determining whether a proposal would adversely affect these rivers and, if so, whether it could preclude inclusion in the National Wild and Scenic Rivers System or alter its potential classification within it. If these circumstances apply, this office should be contacted for further consultation.

A number of parks within the study area were funded under the provisions of Section 6(f) of the Land and Water Conservation Fund Act, as amended. This section of the Act requires that changes from recreational use be approved by the Secretary of the Interior, and requires the substitution of other properties of at least equal fair market value and reasonably equivalent usefulness and location. Any request for a change in land use must be made through the State Liaison Officer for Montana. He is Mr. Ron G. Holliday, Administrator, Parks Division, Montana Department of Fish, Wildlife and Parks, 1420 E. 6th Avenue, Helena, Montana 59601.

Alan O'Neill

11a

STATE OF MONTANA

DEPARTMENT OF FISH AND GAME

P.O. Box 430
Miles City, MT. 59301
March 30, 1982

Mr. Ray Brubaker
District Manager
Bureau of Land Management
P.O. Box 940
Miles City, MT 59301

Re: Comments on the BLM's Big Dry Vegetation Allocation (DEIS).

Dear Mr. Brubaker:

First I would like to state that my comments are not intended as negative criticisms, but instead are offered as positive suggestions in support of a difficult task.

Cover and Summary Pages. It seems to me that the goal and objective are not defined, but in fact are commingled. Consequently, it appears that grazing in the goal and allotment of that grazing the objective. May be these are the BLM's goal and objective, if so what follows is superfluous. In our discussions during DEIS preparation it was my understanding that the goal was: to promote and maintain the growth of range vegetation. Further, I had the idea that the objective was: to determine on an individual allotment basis the action necessary to accomplish the goal. Any of the individual alternatives or actions (A-D) considered singly were held unrealistic. A written alternative or action A has now become the preferred objective for the Big Dry area. I believe the above distinction is critical because if grazing is the goal and allotment of grazing the objective, multiple use conflicts will continue to occur. It's an open door of contention between competing publics and between disciplines as to objectives. Comments within the 1st column of the summary page support my concern. The way I read the EIS (see 1st column of Summary page) the "management program" has become the goal and anyone or parts of all "Alternatives" the objective. I'm sure I think it would help all concerned if we knew exactly what the goal and objective were, then the procedures or "alternatives" to accomplish the objective would make sense.

23 Chapter 1, Page 1 - Subtitle "Basis", Paragraph 2. Unfortunately, the goal of the EIS is "to develop a livestock grazing program." Wouldn't a more realistic goal be centered on vegetation? Then the statement, "the purpose of the [unbound action] is to implement decisions" would have validity because it would not be justifying some special use activity.

11b

Chapter 2, Page 5, Paragraph 3, 1st Sentence. This is embarrassingly true of many agencies, including the Fish and Game. The very reason for our existence is that which we know least about. These situations result from activities lacking a specific goal and objective with planned procedures designed to achieve definite measureable output. My concern regarding the reality of a goal or absence there of is born out by the fact of this sentence. Hopefully those responsible for the EIS and direction of BLM activities will make the needed changes now, at the planning stage.

24 Page 19, Subtitle "Vegetation", Paragraph 1, 1st Sentence. No big goal but is "badland" a "vegetation community"?

Page 20, Subtitle, "Range...Trend", Paragraph 3, 1st Sentence. This being true then how can any alternative be considered preferred? To me this gets back identifying the goal and objective. By the way, just for my sake what is meant by alternative? Alternative to grazing? Alternative to deciding upon a goal and objective? Alternative ways to continue the same basic operation? It's not obvious I don't understand and I think it's because I can't decipher the goal of the EIS. To me the EIS appears as a document justifying grazing and I don't believe grazing needs to be justified, it's a desirable use.

26 Page 21, same subtitle as above, Paragraph 2. Is NO acres or .0000685 of 1.18 million really as "serious" problem? This isn't realistic since 47,830 acres (cover page) were "considered unsuitable for proper management." All kinds of these seemingly needed activities are allowed to flourish when there isn't a goal and objective, in fact, they often become the goal. Classic examples involve all manner of rangeland manipulation projects.

Page 21, same as above, next to last paragraph. I believe one should probably review Carl B. Koford's, Wildlife Monograph (No. 3, 1958) "Prairie Dogs, Whitefaces, and Blue Grama" before making such statements as the above paragraph.

Page 31, Column 3, Conclusion. I hate to keep harping on some predetermined alternative or action (in this case alternative A) as being the objective, but this paragraph substantiates some of my concerns.

27 Let's conclude that after due process BLM's preferred alternative (alternative A) is accepted and become policy. What does this mean in terms of the last sentence of the conclusion paragraph? Does it mean that livestock numbers could not be decreased on any given allotment? Somehow the purpose of the EIS keeps coming across as an effort to justify grazing.

11c

Page 3
Ray Brubaker
March 30, 1982

28 Page 31, Column 3, Subtitle, Big Game, 1st Sentence. "Upland vegetative habitats" should be changed to upland vegetation types or upland habitat types.

29 Page 32, Column 3, Subtitle, Conclusion. From a wildlife standpoint what has been gained by the [EIS] Process? The first sentence of the conclusion section demonstrates the intent of Alternative A, In honesty, I can't see much difference between alternative A and D except the desire to produce more vegetation for domestic livestock. Since the other alternative(B & C) are unreasonable it seems evident that pruning, particularly by livestock, is the goal.

In summary, I would like to reiterate that it was not my purpose to belittle the EIS or any of those who prepared it. Further, realizing my biases toward wildlife, I tried to restrict my comments to what I believed the goal to be, namely the production and maintenance of range vegetation. I also realize my shortcomings in understanding the process and demands of EIS procedural requirements. My primary consideration was to try to strengthen the EIS by identifying areas that I believe tend to confuse and/or prevent reason for conflict.

Thanks for the opportunity to comment.

Best regards,

Neil

Neil S. Martin
Regional Wildlife Manager

NSM:fr

13

APR 1982
Bureau of Land Management
Miles City, Montana

Plevna, Montana 59344
April 2, 1982

Ray Brubaker, District Manager
District Office, BLM
P.O. Box 940
Miles City, Montana 59301

Dear Mr. Brubaker:

At a recent meeting of the Board of Directors of the Red Butte Cooperative State Grazing District we reviewed and discussed the Bureau of Land Management's Big Dry Environmental Impact Statement and Vegetation Allocation Draft. We found it interesting, easy to understand, and attractively arranged.

All data and information pertaining to each of the four alternative courses of action seems thorough, impartial, and to the point. Congratulations to all who contributed.

We, too, support Alternative A, and look forward to working with you and your staff to improve our public lands.

Sincerely yours,

Robert F. Neumann

Robert F. Neumann
President, Red Butte
Cooperative State Grazing
District
Rte. 1
Plevna, Montana 59344

12

Leon Jens, Chairman • Robert Hath • Alvin Stocker • Robert Reukauf • Joe Roos

RUTH Y. ROOS, Secretary-Treasurer

PRAIRIE COUNTY *Co-operative State Grazing District*

TERRY, MONTANA 59349

March 29, 1982

APR 1982
Bureau of Land Management
Miles City, Montana

Ray Brubaker, District Manager
Bureau of Land Management
Box 940
Miles City, Montana 59301

Dear Mr. Brubaker:

We, the Prairie County Cooperative State Grazing District, would like to go on record as supporting Alternative A as presented in the Big Dry Environmental Impact Statement.

We would also like to commend you and your staff on what we feel was a very good job of assessment of the situation. We agree with your figures on present range conditions.

It was also gratifying to see that the group that prepared the EIS held the expense at a minimum.

Sincerely,

Prairie Co. Coop. State
Grazing District
by Ruth Y. Roos, Sec'y.

RESPONSES TO COMMENTS AND LETTERS

1.

The BLM is required under the Federal Noxious Weed Law, Montana State Noxious Weed Law and County Weed Law to control the spread of noxious weeds. Mr. Loreth has been contacted regarding this problem.

2.

Current land use plans have only identified areas with potential for agricultural use. Cultivation of crops on soils in land capability classes (LCC) IV, V, VI, VII, and VIII, should not be authorized. Cultivation may be allowed on lands in LCC III or better. The harvesting of hay may be authorized on LCC III, IV and V. Through activity planning, site specific Order I soils survey will be used to determine conservation practices, develop a conservation plan, improve soil productivity and prevent soils loss, on LCC III areas if cultivated. Nominated lands for buildings and industrial sites will be limited to LCC VI and VII.

3.

The Bureau is committed to the control of noxious weeds on the public lands in the interest of proper management. The District is presently attempting to develop management programs to control noxious weeds.

4.

All County Conservation Districts in the Miles City District have been placed on our mailing list for future consultation.

5.

Appendix 3.3 chart was presented as an example of various soil series within range sites and is not intended as an all inclusive list. (See footnotes A and B.)

Item #3—The typic Haplaquents referred to, consist of small areas within Richland County (1.4% of Richland County) and smaller portions within the EIS area. No areas of saline lowland were identified on public land in the EIS area.

Item #5—See footnote B Appendix 3.3. Banks have surface textures and physiographic positions giving it sands, sandy and overflow range sites. In the EIS area it occupied predominately sandy range sites.

Item #7—See footnote B Appendix 3.3. Havrelon has surface textures and physiographic positions giving it silty and overflow range sites. In the EIS area, it is predominately an overflow range site.

Item #11—For Lambert soils see Appendix 3.3 footnote B. Vida series does not meet the greater than 20% slope criterion to be in the thin silty range site. Vida is predominately a silty range site.

Item #12—Dimyaw as described in the Richland County Soil Survey is a clayey or thin clayey range site. Areas mapped with the Dimyaw series and surveyed on public lands fell into the shallow to clay range site.

6.

On the first page of the EIS, 2nd paragraph, 3rd sentence, the acres should read 48,700.

There is a point of misunderstanding in your assumption that "51% (of the lands) are in holdings unsuitable for management."

The remaining 51% could improve in condition, but are in such small, scattered tracts that implementation of an allotment management plan is infeasible to remain under custodial management.

The amount of land in fair and poor condition is 155,462 acres as stated on page 8. The Range Condition, Production and Trend section, page 20, paragraph 1, breaks down this figure into 95,491 acres of fair and poor condition land and 59,971 acres of tame pasture. The tame pasture acreage is included with the less than good condition land because it is considered to be producing less than it could be. These figures are shown in Table 2-2 on page 9.

The 159,000 acres in chapter 4 under the watershed section should be 155,462 acres.

7.

Vegetation and forage increases would be the result of the improvement of areas in less than good condition. No specific grazing systems are proposed in the DEIS. The choice of a grazing system (simple to complex) will be made during management plan preparation and likely modified after implementation to achieve allotment specific objectives.

8.

As discussed in Appendix 2.2: Soils, Range Site, Ecological Condition and Vegetation Mapping Data was used in concert with SCS technical guide information to develop the current and potential grazing capacity information used in the EIS. As discussed, time constraints did not allow the use of transect data for production estimation; therefore, these questions (though valid normally) have no bearing on the EIS data presentation.

9.

Fifty percent of the monies used for implementation are from past grazing fees paid by the operators. This source is not tax money. Implementation costs would likely be substantially lower than estimates as mechanical treatment would not be necessary on all treatment suitable lands. Reduction or elimination of that cost would reduce Alternative A implementation costs by as much as 32% ($3,863,456). Implementation cost would then be $8,092,295.

The statement "Eighty-five percent of the EIS area is in good to excellent range condition," does not necessarily imply that 85% of the watershed is in good to excellent condition, although the two are usually correlated. Lands with greater than 15% slopes require less vegetation (ground cover) for a good or excellent range condition rating than do lands with less than 15% slope. Absence of ground cover is one of the major factors in accelerated erosion.

Most of the improvement in watershed under Alternative A will result in increased ground cover or areas with 15-50% slope. The ground cover will increase due to implementing the grazing practices previously mentioned in the watershed portion of Alternative A.

Under this Alternative there would be no increase in wildlife outside of normal population fluctuations, because the current management emphasis would continue. That emphasis is to improve distribution of livestock use; consequently the maximum share of the 11 million dollars would be allocated to grazing management.

Noxious weed control (the highest implementation cost item) comprises 32% of total costs. If mechanical treatment were eliminated, weed control costs would be 47% of the total remaining costs. Failure to control noxious weeds would likely result in much higher costs (real or lost value) at a later date.

10.

Public lands will become increasingly more important to wildlife as conversions of large blocks of private land to cultivation continue. However, wildlife management will not be prioritized on all of the public land in the Big Dry Resource Area to account for cultivation of private lands. As much as possible management will be balanced for multiple uses.

A discussion (with map illustration) of the ratio of cropland to public rangeland would have better established the increasing importance of public rangelands as wildlife habitats. Due to the fact that the Bureau has no control and only limited information on private lands, only the management of public lands was addressed in the EIS.

11.

Specific range improvements will be identified in the development of individual Allotment Management Plans. Soil capabilities and limitations will be used in focusing consideration of these range seedings.

12.

Rest rotation is the best method for maintaining riparian and woody draw habitats; however, other systems may give less than optimum but acceptable results (excepting riparian habitats). Livestock grazing systems are implemented on an allotment basis and must consider range site productivity, land ownership pattern, operator's capabilities, budget limitations, resource needs and other criteria. Grazing systems on 27 of the 30 existing AMPs were determined to be better suited to those allotments than rest rotation. The 63 new AMPs will be individually evaluated for the grazing system best suited to each.

13.

BLM Manual 6740.23A (10/01/79) specifies that grazing systems and management practices be designed to give "riparian vegetation the protection necessary to maintain and restore habitat cover and diversity, shoreline-streambank stability, reduce sedimentation, provide water temperature ranges suitable for desirable aquatic life, and to meet State and Federal water quality standards." The manual further states that: "Grazing management procedures may include

livestock management practices or protective fencing to exclude grazing use in riparian areas."

Proposals in Alternative A to maintain and restore riparian areas include rest and deferment grazing treatments, development of water sources on uplands, proper placement of salt, rubbing and shade, increases in desirable forage on upland areas from grazing and mechanical treatments and protective fencing as identified. Rest rotation grazing is cited as the most suited for maintaining the vegetative diversity of those habitats. (Under Alternative A (Environmental Consequences), we state that rest rotation should be given priority consideration.

All of the above measures would be considered as AMPs are developed. Some allotments are well suited for management systems that benefit riparian areas, but others are too small to allow such a system to be instituted.

Also refer to response #12.

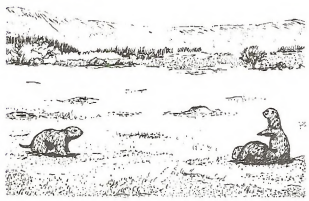
14.

Although a serious problem does not currently exist in the Big Dry Area, BLM is concerned with the potential for expansion of prairie dog towns. If expansion were to occur similiar to that in the Buffalo Gap National Grasslands, black-tailed prairie dogs would be a serious problem in the EIS area in the future. If prairie dogs could be kept in check with control and improved grazing management, a problem might never materialize.

Vegetation management, either through grazing or mechanical treatments or both, could theoretically control the establishment of most new prairie dog towns. Livestock concentration areas around reservoirs, salting areas and oilers would continue to provide habitat for the establishment of prairie dog towns.

It is clear that prairie dogs reduce vegetation production not just for forage for livestock but also for wildlife forage and cover, and for watershed protection. Denuded prairie dog town sites inhibit the infiltration of water, causing more surface runoff. This runoff produces offsite erosion of fragile soils on sloping to steeply sloping landscapes characteristic of lands adjacent to prairie dog towns. Erosion of valuable soil resources reduces the productivity of the range and also contributes large quantities of sediment to wildlife/livestock reservoirs and streams.

Prairie Dogs



Control of prairie dogs is proposed because of vegetation removal, excessive runoff and erosion, reduced wildlife cover and the potential for expansion. BLM does not propose reductions in the prairie dog population simply because of reduced forage for or competition for forage with livestock, but to meet multiple use objectives.

The Montana BLM Prairie Dog Policy as of April 1980 (Appendix 2.6, page A-43) will be followed in the management of black-tailed prairie dogs.

15.

The monitoring schedule is shown on page 4. A detailed schedule will be included in the area monitoring plan.

16.

Grazing seasons would be extended only as increases in forage production allow. Overuse of crucial habitats would be prevented.

Identification of crucial habitats needing special vegetation allocations would be done in conjunction with local biologists of the Montana Fish, Wildlife and Parks Dept. These allocations would be reserved in the allotment planning level.

We do not know the percent of shrub utilization currently attributable to livestock. Monitoring would be directed at answering these and other questions about utilization.

17.

In some cases development in riparian and woody draw habitats cannot be avoided. An actual example of a needed development that could not avoid a wooded draw was: A spring development that would improve the distribution of livestock water was proposed in a relatively deep, steepsided wooded draw. The topography would prevent locating the stock tank outside of the drainage except at considerable cost. Development of a well as an alternate choice would also be quite expensive. With the current economic concern, springs are given preference to wells.

Also see response #12.

18.

As indicated above, there are situations where developments cannot avoid riparian and woody draw habitats.

Also see response #12.

19.

The increase in AUMs could lead to increased grazing fee revenues annually of approximately $32,000. It is not possible, without knowing income tax rates, for individuals to estimate increases in income tax revenues. It should be noted that most implementation costs are to be provided by portions of past grazing fees collected.

20.

The Bureau's Alternatives to vegetative allocation do not constitute a conflict situation with potential users of the National Historic Trail or any National or Historic Landmark. The anticipated levels of development or surface disturbance will not interfere with the existing style of dispersed recreational use of the trail.

Capitol Rock N.N.L.—This is out of our study area. Almost all of Carter County is in the Powder River Resource Area of the Miles City District.

Hagan site N.H.L.—This site is on private land, and our EIS planning document addresses only public lands. The integrity of this site hinges on the surface owner.

Implementation of the Big Dry EIS would have no effect on the Bug Creek or Hell Creek fossil areas.

21.

Appendix 4.3 provides the memorandum of agreement between the BLM and the Advisory Council on Historic Preservation for protection of cultural sites in the livestock grazing and range improvement program.

22.

Implementation of the Big Dry EIS would have no effect on identified rivers or parks.

23.

When the entire paragraph is taken in total context as the goal, it points out that the purpose is to implement decisions needed for management, protection, and enhancement of the rangeland resources. Every attempt will be made to "equitably allocate the vegetation among competing consumptive and nonconsumptive uses, and implementation of grazing systems and range improvement projects to maintain or improve vegetation yields and watershed condition."

24.

"Badland . . . Vegetation community" is used with the same connotation as a badland range site. It is a complex of communities growing in an area of mixed soils, range sites, steep and varied slopes, many exposures and varied topography.

25.

The draft EIS is designed to identify impacts on the environment, address possible mitigating measures to reduce adverse impacts, and analyze alternatives to the proposals. The alternatives provide the decision-maker with a variety of views of what will happen if the proposed action is implemented in a different manner.

26.

"Unsuitable for proper management" was an unfortunate choice of words and does not adequately reflect the information portrayed in the document. Considering that there is no control method known, its vigorous invasion ability and the almost total loss of production on occupied sites, the 4500 acres (not 80) of leafy spurge invasion is considered a serious problem.

The Big Dry EIS was prepared to assess the effects of alternatives of allocating vegetation among various users. It does not, however, allocate land use per se. Following completion of the EIS, implementation or revision of the actual Allotment Management Plans (AMPs) after monitoring data becomes available will increase, decrease or maintain the level of livestock numbers on any given allotment.

28.

The sentence has to be changed to read ". . . upland habitat types, . . ."

29.

In the Big Dry EIS area half of the forage is allocated for watershed protection, wildlife cover and to meet the physiological needs of plants. All non-forage vegetation is also reserved for watershed protection and wildlife habitat. The proposals in the EIS to increase forage are designed to improve watershed protection and wildlife food and cover. Although additional forage would be made available to livestock, half of the total increase is also allocated for watershed protection and wildlife cover. Proposals to improve the distribution of livestock are designed to reduce impacts from livestock concentrations around facilities. Mechanical treatments to improve range condition and increase forage production would also protect water and soil resources by reducing runoff and erosion. Greater forage also supplies additional food and cover for wildlife species.

The BLM recognizes the Montana Department of Fish, Wildlife, and Parks as an important source of information for formulating management decisions, that could affect wildlife habitat. We will continue to coordinate with the MDFW&P and to solicit opinions from local and regional personnel regarding ongoing and future land use actions.

Comments by Phone — Received April 5, 1982

From: Mrs. Whaley, Waco, Texas
To: Jim Murkin, Project Manager Big Dry EIS.

Mrs. Whaley has two major points or questions concerning the Big Dry EIS.

30) How were the allotments designated "potential AMPs" determined?

30.

Proposed (potential) Allotment Management Plans (AMPs) were selected on the basis of blocked-up public lands, range condition, watershed values or concerns and wildlife habitat values.

31) She was concerned over her ranch being shown as a potential AMP. She is not interested in this type of designation. She felt that as long as their management was taking care of things and keeping up to BLM standards this was not necessary.

31.

The proposed (potential) AMP allotments would be evaluated (in consultation with the Permittee/lessee) to determine feasibility and need for a management plan and grazing system development.

CORRECTIONS/ERRATA

pg. 18; Col. 1; paragraph 7 should read:
. . . due to their limited areal extent, Alluvium deposits. . .

pg. 19; Fig. 3-2 The sources at the bottom of the chart should be numbered to reflect the numbers in parenthesis along the left margin:
1) BLM 1981-A
2) BLM 1981-B
3) USGS Annual Reports-C

pg. 22, Table 3-4. Last two items in left column under "Grass" (common dandelion and prairie clover) should be in right hand column under "Forbs."

pg. 34; Col. 2; paragraph 4 should read:
. . . deferment of grazing for 3 months in the spring . . .

pg. 35; Col. 3; paragraph 7 should read:
. . . winter range reservations for wildlife equate to a livestock loss of . . .

pg. 36; Col. 2 paragraph 2 should read:
Existing livestock reservoirs with . . .

pg. 36; Col. 3 paragraph 2 should read:
. . . 100% of the vegetation on winter ranges and prairie dog towns to wildlife.

pg. 39; Col. 3; paragraph 8 should read:
. . . prairie dog numbers on short- to mid-grass prairie.

pg. 39; Col. 3; paragraph 9 should read:
. . . similar results because of soils, precipitation and other differences.

pg. A-77; Col. 2; paragraph 5 should read:
. . . in ranch (gross receipts above cash cost . . .

pg. A-77; Col. 2; paragraph 6 should read;
. . . the same size ranch would increase ranch income $5.77 per AUM.

Map Section

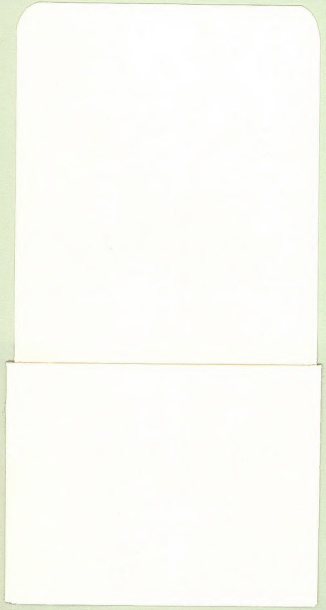
Soils map changed to note there are no range sites on the map. Title should read: SOIL SUBGROUPS.

Allotment Map: Legend changed from "UNLEASED AMPS" to UNLEASED LANDS.

Allotment Map: The peach-colored area (unleased lands) located in Township 10N Range 37 & 38E should be white indicating private land. Only the East 1/2 of Section 8 in Range 38E should indicate unleased lands (peach color).

Allotment Overlay: Allotment 2714 (Township 5 & 6N, Range 57 and 58E) boundary has been amended in consultation with permittee.

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225



Form 1540-2
(January 1979)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
P.O. BOX 940
MILES CITY, MONTANA 59301
Return if not delivered in 10 days

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, $300

POSTAGE AND FEES PAID
DEPARTMENT OF THE INTERIOR
INT 415